

UNSEALED

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION**

32
United States District Court
Southern District of Texas
FILED

NOV 08 2016

UNITED STATES OF AMERICA

v.

**JOSE LUIS SOTO-LOPEZ
ERICA JANINE SOTO**

§
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§
§
§
§

Criminal No.

M-16-1627

David J. Bradley, Clerk

SEALED INDICTMENT

THE GRAND JURY CHARGES:

Count One

On or about February 10, 2014 through September 1, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**JOSE LUIS SOTO-LOPEZ
and
ERICA JANINE SOTO**

knowing and in reckless disregard of the fact that individuals, who were aliens, had come to, entered and remained in the United States in violation of law, did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jurors to transport and move said aliens within the United States in furtherance of such violation of law, that is, from locations in the Rio Grande Valley, Texas, to another location near Houston, Texas, by foot and by means of a motor vehicle.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(ii), and 1324(a)(1)(B)(i).

Count Two

On or about February 10, 2014 through September 1, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

JOSE LUIS SOTO-LOPEZ
and
ERICA JANINE SOTO

knowing and in reckless disregard of the fact that individuals, who were aliens, had come to, entered and remained in the United States in violation of law, did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jurors to conceal, harbor, and shield from detection said aliens in any place, including any building or any means of transportation, to wit: in residences located near Alamo, Texas; Donna, Texas; Houston, Texas; Mercedes, Texas; and Weslaco, Texas.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(iii), and 1324(a)(1)(B)(i).

A TRUE BILL

FOREPERSON

KENNETH MAGIDSON
UNITED STATES ATTORNEY



ASSISTANT UNITED STATES ATTORNEY